

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JACQUELINE D. BERRY,
Plaintiff

v.

STATE OF DELAWARE DEPARTMENT OF
HEALTH AND SOCIAL SERVICES, DIVISION
OF CHILD SUPPORT ENFORCEMENT
Defendant.

Civil Action No. 06-217-GMS

Motion For Extension of Time

The plaintiff, Jacqueline D. Berry, hereby moves for an extension of time to respond to the defendant's motion to strike plaintiff's motion for Summary Judgment, dated July 5, 2007 and amended motion dated July 6, 2007. The reason for this extension is that the plaintiff's inability to seek legal counsel has hampered her capability and due to the lack of legal knowledge and plaintiff's probable inability without such assistance to prevent the facts and legal issues to the court. Plaintiff is requesting representation by counsel to be appointed due that plaintiff's claim has arguable merit in fact and law. Plaintiff finds that her complaint and allegations are of such complex nature that representation by counsel is requested at this time by the United States District Court. This request for extension is being made allowing plaintiff ample time to seek legal counsel.

DATE: July 16, 2007

Plaintiff, JACQUELINE D. BERRY

RG SECURED
92:3 WD 91 JUL 16 2007
FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE


Jacqueline D. Berry
Jacqueline D. Berry
20 Hickory Lane
Dover, Delaware 19904
302-399-8613

Certification

Two copies of this Motion for Extension have been supplied to:

Marc P. Niedzielski (#2616)
Deputy Attorney General
820 N. French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8324
Attorney for Defendant

hand delivered this day of July 16, 2007.


Jacqueline D. Berry